

FILED 11 MAR '14 15:44 USDC-ORP

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

**No. 3:14-CR-00108-md**

**Plaintiff,**

**I N D I C T M E N T**

**v.**

**18 U.S.C. § 2  
21 U.S.C. § 841(a)(1)  
21 U.S.C. § 841(b)(1)(B)(viii)  
21 U.S.C. § 841(b)(1)(C)  
21 U.S.C. § 846**

**ALBERTO RODRIGUEZ-ALONSO,  
MANUEL AGUILAR-VARGAS,  
OMAR RANGEL-LARIOS, and  
PRESTON LEE UDENBY**

**Defendants.**

**THE GRAND JURY CHARGES:**

**COUNT 1**

**CONSPIRACY TO DISTRIBUTE COCAINE**

Beginning on or about July 14, 2013, and continuing through January 9, 2014, within the District of Oregon and elsewhere, **ALBERTO RODRIGUEZ-ALONSO, MANUEL AGUILAR-VARGAS, OMAR RANGEL-LARIOS and PRESTON LEE UDENBY** defendants herein, did knowingly and willfully combine, conspire, confederate, and agree together and with persons whose identities are known and unknown to the Grand Jury, to distribute a quantity of a mixture or substance containing a detectable amount of cocaine a Schedule II

controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1); 841(b)(1)(C) and 846.

**COUNT 2**

**POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE**

On or about January 9, 2014, within the District of Oregon and elsewhere, **ALBERTO RODRIGUEZ-ALONSO**, and **MANUEL AGUILAR-VARGAS** defendants herein, knowingly possessed with intent to distribute more than 50 grams of a quantity of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1); 841(b)(1)(B)(viii) and Title 18, United States Code, Section 2.

**CRIMINAL FORFEITURE – DRUG OFFENSE**

Upon conviction of the controlled substance offense listed above in Count 1, **ALBERTO RODRIGUEZ-ALONSO**, **MANUEL AGUILAR-VARGAS**, **OMAR RANGEL-LARIOS**, and **PRESTON LEE UDENBY**, defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violation, including but not limited to the following assets:

1. The sum of \$24,474.31 seized from defendant **RODRIGUEZ-ALONSO**'s residence on January 9, 2014, representing a portion of the proceeds of defendants' criminal activity.

### **Money Judgment**

The sum of \$20,000, representing a portion of the proceeds of defendants' criminal activity, and/or funds used to facilitate defendants' criminal activity, and/or funds involved in defendants' criminal activity, in violation of Title 21, United States Code, Section 841(a)(1) as set forth in Count 1 of this Indictment.

### **CRIMINAL FORFEITURE OF FIREARMS AND AMMUNITION ALLEGATION**

Upon conviction of the offense alleged in Count 1, Conspiracy to Distribute Controlled Substances or Count 2, Possession with Intent to Distribute Controlled Substances, **ALBERTO RODRIGUEZ-ALONSO**, and **MANUEL AGUILAR-VARGAS** defendants herein, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense, including but not limited to the specifically:

- 1) Colt Woodsman .22 caliber pistol containing 15 live rounds of ammunition
- 2) Box of 100 .22 caliber rounds
- 3) Six 30-30 caliber rifle rounds

Dated this 11 day of March 2014.

A TRUE BILL.

OFFICIATING FOR PERSON 

Presented by:

S. AMANDA MARSHALL, OSB #95347  
United States Attorney  
District of Oregon

  
JENNIFER J. MARTIN, OSB #84285  
Assistant United States Attorney